

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

AMY ANN PITTS,)	
)	
Petitioner,)	
)	
VS.)	Civil Action No. 2:06cv1129-MEF
)	
UNITED STATES OF AMERICA,)	
)	
Respondent.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO GOVERNMENT'S RESPONSE**

Comes now Petitioner Amy Ann Pitts, by and through counsel, and shows as follows:

1. On January 11, 2008, this Court granted Petitioner an extension until January 31, 2008 within which to file a reply to the government's response in this case. (Doc. 28).
2. In the past week, the undersigned counsel has had much of his time taken up with a difficult client in another case before this Court, a literally self-destruction client in a case set for trial in a state court case next week, and a limited English speaking client in another case set for trial in state court next week. Additionally, the undersigned counsel has been contending with other cases on state court dockets next with no indication of when or whether the cases will be called out for trial.
3. Under these circumstances, the undersigned counsel has been unable to travel to Marianna, Florida to confer in person with the petitioner in this case.

4. The undersigned counsel will in all likelihood need time beyond January 31, 2008 to meet in person with the petitioner and prepare the reply to the government's response.

4. The undersigned counsel has discussed this matter with opposing counsel, Assistant United States Attorney Sandra J. Stewart. Ms. Stewart has no objection to an additional extension of time for the undersigned counsel to file Petitioner Amy Ann Pitts' reply.

WHEREFORE, Petitioner Amy Ann Pitts moves this Court to allow her until February 8, 2008 within which to file her reply to the government's response.

s/ Thomas M. Goggans

Ala. State Bar No. 2222-S45-T
2030 East Second Street
Montgomery AL 36106
PH: 334.834.2511
FX: 334.834.2512
e-mail: tgoggans@tgoggans.com

Attorney for Petitioner
Amy Ann Pitts

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

AMY ANN PITTS,)	
)	
Petitioner,)	
)	
VS.)	Civil Action No. 2:06cv1129-MEF
)	
UNITED STATES OF AMERICA,)	
)	
Respondent.)	

CERTIFICATE OF SERVICE

I hereby certify that I have on this the 10th day of January, 2008, electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of each of the following: Sandra J. Stewart.

s/ Thomas M. Goggans

Ala. S.J.I.S. GOG001
2030 East Second Street
Montgomery AL 36106
PH: 334.834.2511
FX: 334.834.2512
e-mail: tgoggans@tgoggans.com

Attorney for Petitioner
Amy Ann Pitts